

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:	}	CASE NUMBER 12-54436-BEM
	}	
Suzanna Thurmon Sligh,	}	CHAPTER 13
	}	
DEBTOR	}	

Suzanna Thurmon Sligh,	}	
	}	
MOVANT	}	CONTESTED MATTER
	}	
v.	}	
	}	
CitiMortgage, Inc.	}	
RESPONDENT	}	

NOTICE OF HEARING

PLEASE TAKE NOTICE that Debtor has filed an Objection to Proof of Claim #7 and related papers with the Court seeking an Order disallowing Respondent's claim.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the Objection to Proof of Claim #7 in Courtroom 1402, United States Courthouse, 75 Spring Street, S.W., Atlanta, GA at 11:00 AM on February 5, 2013.

Your rights may be affected by the court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (if you do not have an attorney, you may wish to consult one.) If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including 2 addresses) you served the response. Mail or deliver your response so that it is received by the Clerk's Office is: Clerk, U.S. Bankruptcy Court, Suite 1340, 75 Spring St., Atlanta, GA 30303. You must also mail a copy of your responses to the undersigned at the address stated below.

Dated: Wednesday, December 26, 2012

Saedi Law Group, LLC

_____/s/_____

Jamie Scaringi-Cherry 628458

Attorney for Debtor

3006 Clairmont Road, Suite 103

Atlanta, Georgia 30329

Phone: (404) 889-8663

Fax: (888) 850-1774

jcherry@SaediLawGroup.com

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OBJECTION TO CLAIM #7 OF CITIMORTGAGE, INC.

COMES NOW Debtor and hereby moves this Court to amend Respondent's claim in this Chapter 13 Case, and shows the Court as follows:

1.

This case was commenced by the filing of a Voluntary Petition for relief in Bankruptcy under Chapter 13 of Title 11 of the United States Code on February 21, 2012

2.

Respondent filed a proof of claim in this case for \$247,388.74 with the arrearage at the time of filing being \$6,733.71. This amount does not accurately reflect the amount owed by Debtor.

3.

Debtor contends that CitiMortgage erroneously force-placed homeowners' insurance on the property, paid for it and now are seeking repayment from her, even though she had already provided proof of ongoing coverage. Debtor has provided the documentation of same, attached as "Exhibit A."

WHEREFORE, DEBTOR respectfully requests a hearing to determine the actual amount owed to Respondent and, in the event that it is determined that no amount is owed, to disallow the claim.

Respectfully submitted,

Dated: Wednesday, December 26, 2012

Saedi Law Group, LLC

_____/s/_____

Jamie Scaringi-Cherry 628458

Attorney for Debtor

3006 Clairmont Road, Suite 103

Atlanta, Georgia 30329

Phone: (404) 889-8663

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jcherry@SaediLawGroup.com

EXHIBIT “A”

NAME AND ADDRESS OF INSURANCE COMPANY
HOMESITE INSURANCE COMPANY OF THE MIDWEST
99 BEDFORD STREET
BOSTON MA 02111-2217

NAME AND ADDRESS OF INSURED
SUZANNA CAMP
785 SUNSET RIDGE LN
LAWRENCEVILLE GA 30045

KIND OF POLICY: Homeowners Insurance
POLICY/APPLICATION/BINDER NO.: 30943603 (P)
EFFECTIVE DATE OF NOTICE: 12:01 AM 07/01/2011 (DATE) (HOUR-STANDARD TIME AT THE ADDRESS OF THE INSURED)
DATE OF MAILING: May 17, 2011
NAME AND ADDRESS OF AGENT/BROKER:

Important
Notices
cont'd

☒ **Additional Information Regarding the Reason(s) for Cancellation or Nonrenewal:**

You have the right to know the specific items of information that support the reasons given for this decision and the identity of the source of that information. You also have the right to see and obtain copies of documents relating to this decision.

If you ask us to correct, amend, or delete any information about you in our files and if we refuse to do so, you have the right to give us a concise statement of what you believe is the correct information. We will put your statement in our file so that anyone reviewing your file will see it.

If you would like additional information concerning this action, state law requires that you submit a written request within ninety (90) business days of the date this notice was mailed to you. Please send your request to:

Progressive Home Advantage 99 BEDFORD STREET BOSTON MA 02111-2217 1-866-960-8609

(Name and address of the person or department to contact for additional information)

☒ **Replacement Insurance Information:** The policy being cancelled or nonrenewed provides fire, extended coverage and possibly vandalism and malicious mischief insurance. If you wish to replace your policy you should make an effort to obtain insurance through another company in the voluntary market. If you have any difficulty in procuring replacement coverage in the voluntary market you possibly may obtain basic insurance coverage through the Georgia Underwriting Association. For further information please contact your agent or broker or the Association at P.O. Box 956158, Duluth, Georgia 30095-6158 (Telephone No. 770/923-7431). This notification is given pursuant to Section 33-24-46 of the Insurance Code.

☐ **Consumer Report:** In compliance with the Fair Credit Reporting Act (Public Law 91-508) and the Consumer Credit Reform Act of 1996, you are hereby informed that the action taken above is being taken wholly or partly because of information contained in a consumer report from the following consumer reporting agency:

(Name) A-PLUS Consumer Inquiry Center (Phone Number) 800-709-8842

(Address) 545 Washington Boulevard Loc. 22-6 Jersey City, NJ 07302

Please see additional information for a disclosure of your rights under this federal law.

Additional Information regarding your rights under the Consumer Credit Reform Act

Pursuant to the Consumer Credit Reform Act of 1996, effective September 30, 1997, you are informed that:

The consumer reporting agency identified on this form did not make any decisions regarding the stated insurance policy. Therefore, the consumer reporting agency would not be able to provide you with the specific reasons why the insurance company is taking the present action.

You have the right to obtain within 60 days of the receipt of this notice a free copy of your credit report from the consumer reporting agency which has been identified on this form.

You have the right to dispute inaccurate information by contacting the consumer reporting agency directly. Once you have directly notified the consumer reporting agency of your dispute, the agency must, within a reasonable period of time reinvestigate and record the current status of the disputed information. If after reinvestigation, such information is found to be inaccurate or unverifiable, such information must be promptly deleted from your records. If the reinvestigation does not resolve the dispute, you may file a brief statement setting forth the nature of the dispute with the consumer reporting agency. Your filed statement will then be included or summarized in any subsequent consumer report containing the information in question.

For complete information regarding the Federal Consumer Credit Protection Law please refer to The Code of the Laws of the United States of America, Title 15, Chapter 41, Subchapter III, (15 U.S.C. § 1681 et seq.).

Michael Mc Donough

AUTHORIZED REPRESENTATIVE

PROGRESSIVE

Progressive Home Advantage

UNDERWRITTEN BY HOMESITE INSURANCE COMPANY OF GEORGIA

99 Bedford Street

Boston, MA 02111-2217

Tel. 877-279-0766 Fax 1-877-273-2984

000872 2061 PROG4

SUZANNA CAMP

785 SUNSET RIDGE LN

LAWRENCEVILLE, GA 30045

Policy Number: 30943603

Reference code: GA 200

April 16, 2011

Dear SUZANNA CAMP,

We are pleased to offer you a new policy from Homesite Insurance Company of Georgia. As you were previously notified, Homesite Insurance Company of the Midwest is no longer writing business in the state of Georgia. The enclosed offer outlines the coverages and premium provided with your new policy. Your eligibility and premium were determined by using your consumer report information, including insurance score and claims history.

Also enclosed with this offer is a summary of your current payment plan. If you have any questions concerning this offer, please contact our Customer Service Department; otherwise your policy and a billing invoice will be mailed within the next 45 days.

Our Customer Service Department can be reached at 877-279-0766 from 8 a.m. to 9 p.m. (EST) Monday – Friday and from 9 a.m. to 6 p.m. (EST) Saturdays. Please mention reference code GA 200.

If you wish to accept this offer of insurance, no action is necessary and there will be no lapse in your coverage. Your new policy will be effective 07/01/2011 .

We appreciate the opportunity to serve your Homeowners insurance needs and look forward to continuing our relationship for many years to come.

Sincerely,

Customer Care Department
Progressive Home Advantage

000872 2061



PROG2 11/10

PROGRESSIVE

PROGRESSIVE**Progressive Home Advantage**

Underwritten by HOMESITE INSURANCE COMPANY OF GEORGIA
99 Bedford Street
Boston, MA 02111-2217
Tel. 877-279-0766 Fax (877) 273-2984

000348 16719 PROG6
SUZANNA CAMP

785 SUNSET RIDGE LN
LAWRENCEVILLE, GA 30045

Policy Number 30943603
Reference code GA 300

May 14, 2011

Dear SUZANNA CAMP,

Thank you for choosing a homeowners insurance policy underwritten by HOMESITE INSURANCE COMPANY OF GEORGIA.

Enclosed you will find many important documents that contain information about your policy underwritten by Homesite Insurance Company of Georgia and explanations of any special policy provisions. Please read your policy carefully to ensure it provides the protection and services necessary to meet your needs. We have also included in this policy package:

- * Our invoice which outlines your premium;
- * Our current billing options;
- * Your policy declarations page which outlines your coverage limits, endorsements and special features of your policy.

Should you have any questions or concerns about your policy or the information in this policy package, please contact our Customer Service Center at 877-279-0766. Please mention reference code GA 300.

Progressive is not affiliated with Homesite. Insurance policies purchased through Progressive Home Advantage are underwritten by the Homesite Insurance Group, a leading provider of homeowners, renters and condominium insurance. Homesite provides the coverage for, and pays the claims associated with, these insurance policies. Progressive is not responsible for the insurance claims or any other obligations of Homesite. Certain Progressive companies may be compensated as licensed agencies for performing services on behalf of Homesite.

Sincerely,

Customer Care Department
Progressive Home Advantage

Please review additional information on the reverse of this letter about your existing coverages and additional coverages that may be appropriate for your policy.

000348 16719



February 10, 2012

To: Citimortgage
Research & Dispute Department

From: Suzanna Sligh
Loan: 5002066747

Fax: 1-866-675-5772

Phone: 770-298-9647

Pages: 4 (including cover)

DUPLICATED MORTGAGES

Attached is a copy of my credit report showing that I have 2 outstanding mortgages with Citimortgage.

This is incorrect as I modified my original loan in 2010 to a MERS loan where a portion was deferred so that I paid interest on a smaller amount.

What appears to have occurred is that when the modification happened, the interest-bearing portion of that loan was viewed as a new loan – but the amount was never deducted from the original loan amount.

Please note that I have brought this matter to Citimortgage representatives and supervisors on many occasions and not only have they stated that I am incorrect, but they have not gone through any process to resolve this matter.

However, now that I have an attorney reviewing all papers and documents in relation to my mortgage situation, this was proven to be on my credit report and **MUST** be resolved immediately before I can proceed with anything regarding my house.

HOMEOWNER'S INSURANCE

I have been advised by my Homeowner's insurance company that the premiums have not been paid – although Citimortgage did verify to them that this is an escrow mortgage and should have been paid. The overall amount that I owe to Citimortgage include this amount even though nothing has been paid to the insurance company, nor have I received any information of alternative coverage by another insurance company on behalf of Citimortgage. This means that since July 2011, I have not had any coverage for my home.

Please have someone contact me about this matter at 770.298.9647.

Sincerely,

Suzanna Sligh

CitiMortgage



www.citimortgage.com

April 21, 2012

SUZANNA T SLIGH
CHARLES CAMP
785 SUNSET RIDGE LN
LAWRENCEVILLE GA 30045

Re: Property Address: 785 Sunset Ridge Lane
Lawrenceville GA 30045

Dear Suzanna T Sligh and Charles Camp:

Thank you for your correspondence dated April 12, 2012, regarding homeowner's insurance on the above-referenced property address.

We have forwarded your correspondence to the appropriate department to complete the necessary research. You will receive a written response to the flood matters addressed in your letter within 10 business days.

If you need further assistance regarding the property insurance for this mortgage account, please contact our Flood Insurance Department at 1-888-492-8340*. Our Insurance Associates are available at this number Monday through Friday from 8:00 a.m. to 10:00 p.m., and Saturday from 9:00 a.m. to 6:00 p.m., ET. TTY Services are also available. To access: Dial 711 from the United States or Dial 1-866-280-2050 from Puerto Rico. When you contact us, please refer to mortgage account number 5002066747011D.

Sincerely,

Insurance Department

CMIOPC1
STE





CitiMortgage, Inc.
Insurance Center
P. O. Box 7706
Springfield OH 45501

May 18, 2012

SUZANNA T SLIGH
785 SUNSET RIDGE LANE
LAWRENCEVILLE GA 30045

Dear Ms. Sligh:

This letter is in response to the recent inquiry we received regarding your homeowner's insurance for the property located at 785 Sunset Ridge Lane, Lawrenceville, Georgia.

On August 25, 2010, we sent a premium payment to Homesite Insurance for the period of July 1, 2010 to July 1, 2011, in the amount of \$553.00. We have contacted Homesite Insurance and confirmed that your homeowner's policy cancelled on July 1, 2011, due to non-payment of premium.

We have not received evidence of hazard insurance for your property at the address listed above.

CitiMortgage will assign a new homeowner's insurance policy under loan # 5002066747. We will charge the appropriate premium to your account and send a copy of the new policy in a separate mailing.

The cost of the homeowner's insurance policy that we assign to your property may be significantly higher than insurance you could obtain on your own. This is because the policy that we assign is issued without evaluating the customary underwriting risks for the property (i.e., loss history, prior carrier history, plumbing and wiring updates, etc.). We recommend that you contact an agent of your choice to obtain the appropriate coverage for your property.

If you need further assistance regarding the property insurance for this mortgage account, please contact our Insurance Department directly at 1-800-442-8774*. Our Insurance Associates are available at this number Monday through Friday 8:00 a.m. to 10:00 p.m. and Saturday 9:00 a.m. to 6:00 p.m., ET. TTY Services are also available. To access: Dial 711 from the United States or Dial 1-866-280-2050 from Puerto Rico. When you contact us, please refer to mortgage account number 5002066747.

Sincerely,



Josh Conner
Research Associate
Insurance Department

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Visit us on line at www.citimortgage.com.

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	}	
CitiMortgage, Inc.,	}	
RESPONDENT	}	

CERTIFICATE OF SERVICE

The undersigned hereby swears or affirms that a copy of the foregoing pleading has been mailed to the following with sufficient postage affixed thereto to ensure delivery by first-class United States mail or by electronic means pursuant to Fed. R. Civ. P. 5(b)(2)(D) and Fed. R. Bankr. P. 9022:

Mary Ida Townson
Chapter 13 Trustee
191 Peachtree Street, N.E.
Suite 2200
Atlanta, GA 30303

Suzanna Thurmon Sligh
785 Sunset Ridge Lane
Lawrenceville, GA 30045

CitiMortgage, Inc.
P.O. Box 6030
Sioux Falls, SD 57117-6030

Sheila Washington
Bankruptcy Specialist
CitiMortgage, Inc.
P.O. Box 6030
Sioux Falls, SD 57117-6030

Dated: Wednesday, December 26, 2012

Saedi Law Group, LLC

_____/s/_____

Jamie Scaringi-Cherry 628458
Attorney for Debtor
3006 Clairmont Road, Suite 103
Atlanta, Georgia 30329
Phone: (404) 889-8663
Fax: (888) 850-1774
jcherry@SaediLawGroup.com